

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CARMELO MILLAN, Individually and on
Behalf of All Other Persons Similarly Situated,

Plaintiff,

vs.

CITIGROUP, INC. and CITIGROUP
TECHNOLOGY, INC.,

Defendants.

Civ. Action No. 07-CIV-3769 (AKH)

AFFIDAVIT OF JANET WALSH

STATE OF NEW YORK)
)
COUNTY OF NEW YORK)

JANET WALSH, being duly sworn, deposes and says:

1. I am an associate with the Locks Law Firm, PLLC, attorneys for the Plaintiff in this proceeding. I submit this affidavit in support of Plaintiff's Opposition to Defendants' Motion for Summary Judgment.

2. Attached as Exhibit 14 is a true and correct copy of the Plaintiff's deposition transcript taken on January 16, 2008, with accompanying exhibits.

3. Attached as Exhibit 15 is a true and accurate copy of the deposition of Thomas Saranello taken on February 7, 2008, with accompanying exhibits.

4. Attached as Exhibit 16 is a true and accurate copy of the deposition of Amedeo Discepolo taken on February 20, 2008, with accompanying exhibits.

5. Attached as Exhibit 17 is a DOL Wage and Hour Op. Letter (October 26, 2006).

6. Attached as Exhibit 18 is the U.S. Department of Labor, Employment Standards Administration, Wage and Hour Division, dated (May 11, 2001.)

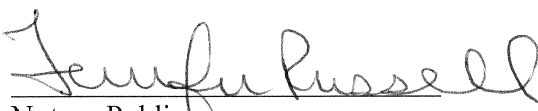
7. Attached as Exhibit 19 is a DOL Wage and Hour Op. Letter (November 5, 1999.)
8. Attached as Exhibit 20 is a DOL Wage and Hour Op. Letter (August 19, 1999.)
9. Attached as Exhibit 21 is an extract from Citigroup's website downloaded on March 12, 2008.
10. Attached as Exhibit 22 is a letter from Defendants' counsel to Plaintiff's counsel dated January 18, 2008.
11. This affidavit is based upon my own personal knowledge, and/or upon my review of what I believe to be true and correct copies of the documents kept in the normal course of business by Defendants.

Dated: New York, New York
March 14, 2008



Janet Walsh

Sworn to and subscribed before me
this 14th day of March 2008.



Notary Public

Jennifer Russell
Notary Public State of New York
No. 01RU6126256
Qualified in New York County
Commission Expires May 2, 2009